

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION AT MEMPHIS

NICOLE FREEMAN, as wrongful-death  
representative of Gershun Freeman and next  
friend to the minor child T.F.,

*Plaintiff,*

v.

SHERIFF FLOYD BONNER, in his  
individual capacity; CHIEF JAILER KIRK  
FIELDS, in his individual capacity; and the  
GOVERNMENT OF SHELBY COUNTY,  
TENNESSEE,

*Defendants.*

No.

**JURY DEMAND**

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**NOTICE OF APPEARANCE**

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**I. NOTICE**

Undersigned counsel, Jacob Webster Brown of the law firm of APPERSON CRUMP, PLC, respectfully gives notice of his appearance in this action on behalf of the Plaintiff, Nicole Freeman, in her capacity as wrongful-death representative of the late Gershun Freeman, as the next friend of the minor child T.F., and on behalf of all wrongful-death beneficiaries.

Dated April 4, 2023.

Respectfully submitted,

/s/ Jacob Webster Brown

Jacob Webster Brown (TN 36404)

Sara Kathrine McKinney\*

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\*Tennessee Bar Applicant

*Attorneys for Plaintiff Nicole Freeman*

## **II. CERTIFICATE OF SERVICE**

This motion is filed on April 11, 2023, via the District Court's electronic-filing service, and all counsel of record will be automatically served by operation of the same.

/s/ Jacob Webster Brown